

A. Michael Covino
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Attorneys for Defendants
Arthur Kupperman and PGB International, LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

MERRILL LYNCH BUSINESS FINANCIAL SERVICES, INC.,	:	Civil Action No. 06-CIV-4802 (DMC)
	:	
	:	
Plaintiff,	:	
	:	
	:	
v.	:	
	:	
	:	
ARTHUR KUPPERMAN, E. ROSS BROWNE, PAULETTE KRELMAN and PGB INTERNATIONAL, INC. and JP MORGAN CHASE BANK, NATIONAL ASSOCIATION,	:	APPLICATION FOR AN
	:	EXTENSION OF TIME TO
	:	ANSWER, MOVE OR
	:	OTHERWISE PLEAD
	:	(LOCAL CIVIL RULE 6.1(B))
Defendants.	:	

Application is hereby made for a Clerk's Order extending time within which Defendants Arthur Kupperman and PGB International, LLC, may answer, move or otherwise plead to Plaintiff's Verified Complaint and Amended Verified Complaint for a period of fifteen (15) days, through and including November 14, 2006. It is hereby represented that:

1. No previous extension has been requested or obtained;

2. Upon information and belief, service of the Verified Complaint was made upon Defendants Arthur Kupperman and PGB International, LLC, on Monday, October 9, 2006;

3. Upon information and belief, service of the Amended Verified Complaint was made upon Defendants Arthur Kupperman and PGB International, LLC, on Friday, October 20, 2006;

4. Pursuant to Fed.R.Civ.P. 6(a), 12(a)(1)(A) and 15(a), Defendants Arthur Kupperman and PGB International, LLC's time to answer, move, or otherwise plead expires on October 30, 2006;

5. Defendants Arthur Kupperman and PGB International, LLC, make this request without waiving any of their defenses to this matter.

For the foregoing reasons, we respectfully request, pursuant to L.R.Civ.P. 6.1(b), that an Order be entered extending Defendants Arthur Kupperman and PGB International, LLC's time to answer, move or otherwise respond through and including November 14, 2006.



A. MICHAEL COVINO

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Attorneys for Defendants

Arthur Kupperman and PGB International, LLC

DATED: October 26, 2006

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

MERRILL LYNCH BUSINESS FINANCIAL
SERVICES, INC.,

Plaintiff,

v.

ARTHUR KUPPERMAN, E. ROSS BROWNE,
PAULETTE KRELMAN and PGB
INTERNATIONAL, INC. and JP MORGAN
CHASE BANK, NATIONAL ASSOCIATION,

Defendants.

: Civil Action No. 06-CIV-4802 (DMC)

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ORDER

The above application is ordered GRANTED, and the time within which Defendants Arthur Kupperman and PGB International, LLC, may answer, move or otherwise plead to the Verified Complaint and Amended Verified Complaint is hereby extended through and including November 14, 2006.

By: _____
Clerk

Order Dated: _____